

OPEN MEETING AGENDA ITEM



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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS
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IN THE MATTER OF MOHAVE
ELECTRIC COOPERATIVE,
INCORPORATED'S APPLICATION FOR
APPROVAL OF ITS PURCHASED
POWER AND FUEL COST ADJUSTOR
PLAN OF ADMINISTRATION

DOCKET NO. E-01750A-11-0136

**MOHAVE ELECTRIC COOPERATIVE,
INCORPORATED'S PROPOSED
CLARIFICATION OF ORDER APPROVING
PPFCA PLAN OF ADMINISTRATION**

Mohave Electric Cooperative, Incorporated ("MEC") supports the Staff Report and Proposed Order filed on March 25, 2013 recommending approval of its proposed Purchased Power and Fuel Cost Adjustor Plan of Administration ("PPFCA POA"), with one clarification. MEC is concerned that the phrase "the starting point" contained in Finding of Fact No. 7¹ wrongly conveys the impression that significant additional documentation concerning MEC's purchased power necessarily must be maintained by MEC. MEC's Document Retention Policy is far more than a "starting point," as it sets forth a comprehensive listing of the type of power purchase documentation MEC's Board intends MEC staff to maintain. Of course it is possible that changing facts may warrant retention of additional or different documentation in the future. In fact, MEC's Document Retention Policy expressly delegates the responsibility for keeping the policy up-to-date to MEC's Chief Financial Officer and further requires the Policy be reviewed by the MEC Board at least every two years.

¹ Finding of Fact No. 7 reads: "As a result of the last rate case, MEC elected to clearly define a Document Retention Policy for power purchases. This policy was filed with the POA and was one of the documents Staff was able to review in draft form in October 2012. The Document Retention Policy clearly outlines the starting point for the retention of power purchase documents and the type of documents that need to be retained." (Emphasis added).

1 In order to eliminate the possibility of an inaccurate interpretation of the phrase "the starting
2 point" in Finding of Fact No. 7, MEC respectfully requests that the last sentence of Finding of Fact
3 No. 7 be clarified by amendment to read: "The Document Retention Policy clearly outlines the type
4 of power purchase documents that Mohave needs to retain and provides for timely review and
5 updating by MEC."

6 The foregoing language has been discussed with Commission Staff and they have indicated
7 they have no objection to the requested clarification.

8 An appropriate amendment to the Proposed Order to accomplish the foregoing would be:

9 Delete the last sentence of Finding of Fact No. 7 and replace with: "The
10 Document Retention Policy clearly outlines the type of power purchase
11 documents that Mohave needs to retain and provides for timely review and
12 updating by MEC."

13 RESPECTFULLY SUBMITTED this 3rd day of April, 2013.

14 CURTIS, GOODWIN, SULLIVAN,
15 UDALL & SCHWAB, P.L.C.

16 By: 

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25

PROOF OF AND CERTIFICATE OF MAILING

I hereby certify that on this 3rd day of April, 2013, I caused the foregoing document to be served on the Arizona Corporation Commission by delivering the original and thirteen (13) copies of the above to:

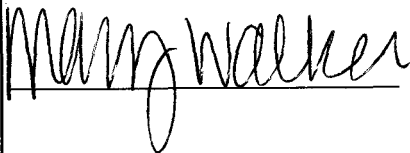
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